

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,

Debtors.

Chapter 11

Case No. 24-11967 (JKS)

(Jointly Administered)

**CERTIFICATION OF COUNSEL REGARDING ORDER APPROVING  
STIPULATION GRANTING LIMITED RELIEF FROM THE AUTOMATIC STAY  
TO WPG MANAGEMENT ASSOCIATES, INC.**

The undersigned counsel to the above-caption debtors (the “Debtors”) and WPG Management Associates, Inc. (“WPG Management”) hereby certify the following:

1. On September 9, 2024 (the “Petition Date”), the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code in this Court. Upon information and belief, the Debtors are operating their businesses and managing their properties as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

2. Prior to the Petition Date, Debtor Big Lots Management, LLC, as lessor, and WPG Management, as lessee, entered into that certain Lease, dated April 7, 2023 (the “Office Lease”), for office space on the 4<sup>th</sup> floor of the building located at 4900 East Dublin Granville Road, Columbus, Ohio.

3. After good faith, arm’s-length negotiations, the Debtors and WPG Management, have agreed, *inter alia*, that the automatic stay under section 362(a) of the Bankruptcy Code, if and to the extent applicable, shall be deemed modified and/or lifted, solely to permit WPG Management to exercise its option right as set forth in the Office Lease (the “Stipulation”).

4. A proposed form of order (the “Proposed Order”) approving the Stipulation is attached hereto as **Exhibit A**. A true and correct copy of the Stipulation is attached to the Proposed Order as Exhibit 1.

5. Accordingly, the Debtors and WPG Management respectfully request that the Court enter the Proposed Order in the form attached hereto as **Exhibit A** at its earliest convenience.

*[Signature page follows]*

Dated: November 25, 2024

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